

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,

Plaintiff,

v.

ARISTA NETWORKS, INC.

Defendant.

CIVIL ACTION NO. 6:20-cv-01083-ADA

JURY TRIAL DEMANDED

**JOINT MOTION FOR ENTRY OF SUPPLEMENTAL
CLAIM CONSTRUCTION ORDER**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development and Defendant Arista Networks, Inc. jointly move for entry of a supplemental claim construction order, as follows:

The Court held a *Markman* hearing and entered its Claim Construction Order on September 24, 2021 [Dkt. 51]. The Claim Construction Order, however, does not include the parties' agreed upon constructions for two terms, as follows:

- for the '447 patent:

“aggregation switch” (cls. 1, 3-5, 12-16)

Agreed Upon Construction
“a network switch residing at the aggregation layer”

- for the '715 patent:

“connection means between the wireless node and the intrusion detection module for providing the intrusion detection module with a copy of the original data frames” (cl. 10)

Agreed Upon Construction
Means plus function, subject to § 112, ¶ 6
Function: providing the intrusion detection module with a copy of the original data frames
Structure: secure link 30, operating according to a respective communication protocol in Figure 1 as well as equivalents thereof

As such, the parties jointly request the Court grant the foregoing motion, adopt the parties' agreed constructions and enter the Supplemental Claim Construction Order attached hereto as **Exhibit A**.

Dated: October 25, 2021

/s/ Shawn Blackburn

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on October 25, 2021, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ Paige Arnette Amstutz
Paige Arnette Amstutz